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Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**FURTHER SUBMISSION IN  
RESPONSE TO QUESTION 2 IN  
ORDER FOR FURTHER RESPONSES  
RE DIXIE FIRE**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further response to Question 2 in the Court’s September 14, 2021 Order for Further Responses re Dixie Fire (Dkt. 1470), as clarified in the Court’s October 28, 2021 Fourth Further Request re Dixie Fire (Dkt. 1499).

**Question 2:**

*As a single exhibit, provide all PG&E (and partner, contractor, etc.) internal emails, texts, memos, and other documents created on July 13 or 14, 2021, pertaining to the July 13 incident on the Bucks Creek 1101 line, and separately summarize them.*

The Court’s October 28, 2021 order included the following clarifying language with respect to Question 2:

*By way of clarification, please submit a summary of the files submitted in response to Question 2 with each submission, not at the conclusion of all submissions (see Dkt. No. 1491 at 3).*

**PG&E Further Response:**

Consistent with PG&E’s September 24, 2021 submission (Dkt. 1479), PG&E is delivering to the Court on November 4, 2021 a thumb drive containing electronic copies of 771 documents bearing Bates PGE-DIXIE-NDCAL-000021794 to PGE-DIXIE-NDCAL-000022754 that PG&E has identified as responsive to this request.<sup>1</sup> These documents include photographs, messages, and other documents from July 13-14, 2021 that have been collected from Mobile Custodians and Custodians, as well as non-custodial documents, as described in PG&E’s September 24, 2021 submission. (See Dkt. 1479 at 4-5.) As with the thumb drives PG&E submitted on September 28 and October 12, 2021, PG&E is not able to provide the documents as a single exhibit

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<sup>1</sup> As set forth in PG&E’s September 24, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

because the documents are different file types, some of which are produced as PDF images (e.g., .rmsf files) and some of which are produced in native format (e.g., .jpg, .mov, and .kml files). To facilitate the Court's review, the thumb drive includes (1) a combined PDF of the entire production, with slipsheets for documents being produced in native format, and (2) an index identifying the Bates range and custodian(s) for each document family in the production.

As set forth in PG&E's September 24, 2021 submission, certain documents being provided to the Court contain personally identifying information and other confidential information. PG&E is in the process of identifying this confidential information and will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

PG&E is continuing to collect and review documents in response to this request, as set forth in its September 24, 2021 submission, and anticipates providing any additional documents identified as responsive to this request by November 12, 2021.

Pursuant to the clarification in the Court's October 28, 2021 order, PG&E is also submitting on a separate thumb drive an excel chart containing a summary of documents submitted as of November 4, 2021 in response to this request. Column A contains the Bates number of the document previously produced, Column B contains the document category, Column C contains a summary of the document and Columns D-M contain certain metadata associated with the document, to the extent available. A brief description of the document categories referenced therein is provided in the table below.

Document Category	Description
Communications regarding Cresta Dam outage	This category includes text messages and emails among PG&E related to the Cresta Dam outage. Items discussed include electric detail tags related to Fuse 805 and Field Automation System ("FAS") tags. This category also includes documents related to the opening of Switch 941 during the evening of July 13.
Communications regarding Dixie Fire response	This category includes text messages and emails among PG&E and between PG&E and various other entities regarding the response to the Dixie Fire. Items discussed include the containment of the Dixie Fire, troublemen

Document Category	Description
	response, de-energizations, outages, temporary flight restrictions (“TFR”) and evacuations.
Communications regarding ignition of Dixie Fire	This category includes text messages and emails among PG&E and between PG&E and various entities related to the ignition of the Dixie Fire.
Communications with first responders to reported origin area of Dixie Fire	This category includes text messages and emails with first responders related to the origin area of the Dixie Fire.
Communications with CAL FIRE	This category includes emails and text messages between PG&E and CAL FIRE related to the Dixie Fire.
Reports regarding Dixie Fire	This category includes reports prepared by the Hazard Awareness & Warning Center (“HAWC”), Emergency Operations Center (“EOC”) and other groups within PG&E.
Maps	This category includes Dixie Fire perimeter maps, dropped pin locations and circuit maps.
Photographs and videos of Dixie Fire	This category includes photographs and videos of the Dixie Fire taken at various locations by various sources.
HAWC records	This category includes documents and communications from HAWC. Formerly known as the Wildfire Safety Operations Center, HAWC is the group that monitors on an ongoing basis for wildfires and other hazards, facilitates mitigation and response efforts, and communicates with stakeholders.
PSS records	This category includes documents and communications from the Public Safety Specialists (“PSS”) group, which serves as primary liaison between PG&E and CAL FIRE during wildfires and provides tactical updates to PG&E.
SIPT records	This category includes documents and communications from the Safety & Infrastructure Protection Team (“SIPT”), which performs wildfire risk mitigation work around PG&E facilities and otherwise assists during wildfires.
RCSC/hydro records	This category includes documents and communications from the Rock Creek Switching Center (“RCSC”), the group that oversees/operates the hydro system in the lower Feather River and DeSabra-Centerville.
NDCC records	This category includes documents and communications from the Northern Distribution Control Center (“NDCC”), the group that oversees/operates PG&E’s distribution lines in the northern area.
Dispatch records	This category includes documents and communications from Electric Dispatch, the group that dispatches and

Document Category	Description
	communicates with troublemen and system operators (e.g., NDCC) regarding outages, emergencies, etc.
UAS records	This category includes documents and communications from the Unmanned Aerial Systems (“UAS”) group (also known as “Helicopter Ops”), which dispatches and communicates with drone operators and communicates TFRs related to wildfires.
GCC records	This category includes documents and communications from the Grid Control Center (“GCC”), the group that oversees/operates PG&E’s transmission lines. During a wildfire event, they monitor and assist in de-energizing facilities as requested by CAL FIRE and maintain stability of the grid.
EOC records	This category includes documents and communications from the EOC, which is staffed by emergency personnel and representatives from various lines of business.
OEC records	This category includes documents and communications from the Operations Emergency Center (“OEC”), the group that facilitates repair/restoration efforts during major events, including wildfires.
Communications team records	This category includes documents and communications from PG&E’s Communications team, which assists with internal and external (media) communications on events, including wildfires.
Other	This category includes documents that do not fall neatly in the categories above.

Dated: November 4, 2021

Respectfully Submitted,

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